

FILED

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE

MARY AIAD AGAIBY HAROWN)
Plaintiff,)

v.)

AMAZON (WAREHOUSE),)
Defendant.)

Case No 3:20-cv-01029

Judge Trauger
Magistrate Judge Frensley

2021 AUG 30 PM 12:51

U.S. DISTRICT COURT
MIDDLE DISTRICT OF TN

RESPONSE TO ANSWER AND AFFIRMATIVE DEFENSES

My name is Mary Harown, I am 44 years old and mother of 4 children. Came to America in 2014 escaping religious prosecution in Egypt and seeking Asylum in a country respects human dignity and where the law is above all. I started working for Amazon on April 2016, three days a week 12 hours night shift.

It was very hard work, especially considering the nightly hours, however, since I was the only breadwinner, I had put all my effort in, to provide for my family while I was pregnant. I had to meet the required "RATE" to keep my job, as Amazon's policy is to terminate those who fail to keep the "RATE". This factor alone was very stressful for me because I was a new comer and did not know how I could go about finding another job if Amazon was to fire me.

I started having pain in my abdominal area and in my back as I was lifting heavy items as heavy as 60 pounds. I requested accommodation or changing position from my supervisor but they paid very little attention to my request and dismissed my complaints despite the pain I was suffering.

I have submitted doctor statements and documentation showing I would risk losing my baby, and it took Amazon 4 weeks to put me on short-term disability.

After giving birth, I returned to work with restrictions to lift no more than 20 pounds and to work no more than 8 hours, this was cause I had hernia in the abdomen due to lifting heavy packages at work.

When I was pregnant, I thought the pain was due to my pregnancy, sadly it continued after I gave birth as it was not due to my pregnancy, instead consequences of the extreme hard work at Amazon.

I was unable to carry my newborn baby, or take care of my regular house chores. I went through treatment and physical therapy all to no avail and my pain continued without relief.

In 2018 I had surgery to remove my uterus, yet the back pain continued, further treatment found my back continue to have issues. The doctor said my lower back vertebrae have pressure due to heavy lifting (the doctor himself said it is very common for Amazon workers, but of course he would not write that down) and I needed back surgery. I had the back surgery and it failed resulted in another

surgery needed. By that time I was put on long-term disability, which was to end August of 2020.

Amazon terminated my employment on February 2020 despite my disability. I suffered severe emotional distress as a result of my termination; I also tried to commit suicide twice shortly after. My emotional distress affected my relationship with my children leading them to think I do not love them any longer. I feel Amazon was a contributor to destroying my family all together through the pain and stress it put in my life as employed and as an unjustly fired worker. I feel Amazon should have kept me on my long-term disability and found me a suitable job that accommodate my disability and restrictions.

The youth years of my children's lives had went by with me excluded from participating on what every mother participate in from activities, and love and just cherish my children as they grow. I trust the American justice system to work, and to punish Amazon for the pain and harm they caused my family and me.

08/30/2022

Mary Harown

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